

Climate Action Plan Public Draft
Comments from Montgomery County Planning Department
February 26, 2021

Montgomery County Climate Conditions Section

Page 33 in the Extreme Heat Section: In addition to extreme heat event days, the number of consecutive extreme days and the number of extreme heat hours during the day is also increasing. This kind of sustained heat is dangerous even at less than extreme temperatures. The calendar graphics make it seem that just a few days a year might be dangerously hot. Perhaps “extreme heat” could be replaced with “extreme and sustained heat”.

Regarding page 69, first paragraph, which states “This new information, combined with baseline inventory data, will provide a strong scientific basis for enhancing existing regulations, policies and programs to retain and increase forests and trees across the County”:

Although Montgomery Planning has now organized our forest programs under our Reforest Montgomery program, there is still more that can be done to make sure we are approaching forest conservation and preservation in the most effective way possible. Montgomery Planning recommends the CAP note that agencies should look at both enhancing existing regulations and expanding ways to work more closely with all the agencies involved in forest conservation. For example, interactions between DEP and M-NCPPC should be more coordinated, as well as work with DGS and MCPS on the siting of new facilities. This recommendation is also relevant for Action S-1 (Retain Forests), Action S-2 (Increase Tree Canopy) and Action S-3 (Restore Forests, Meadows, and Wetlands) in the Carbon Sequestration Section.

Clean Energy Section

Action E-1 (Community Choice Energy, pg. 91) and Action E-3 (Promote Private Solar Photovoltaic Systems, pg. 94) both mention the potential for siting new clean energy generation facilities within Montgomery County. Both also speak of the debate over the use of the Agricultural Reserve for siting solar energy generating facilities. This relates to another recommendation that came out of the Clean Energy Workgroup that proposed developing criteria to evaluate the pros and cons of different siting options:

- *Strategy 2.2 – Assess feasible public and private locations for solar and wind installations of various scales in Montgomery County and adjacent jurisdictions.*
 - *Action 2.2.1 – Develop a ranking system to categorize sites based on economic, environmental, and social considerations.*
 - *Action 2.2.2 – Evaluate financial incentives to encourage solar development on brownfields and other preferred solar locations.*
 - *Action 2.2.3 – Examine feasibility of solar on industrial sites like the Dickerson power and incinerator facilities.*
 - *Action 2.2.4 – Work with other jurisdictions and the State to ensure coordinated efforts related to siting renewable energy facilities.*

- *Action 2.2.5 – Examine the feasibility and benefit of solar on utility poles.*

This evaluation involves significant land use issues. While M-NCPPC may not be directly involved in establishing a Community Choice Energy Program or developing incentives to promote private solar photovoltaic systems, M-NCPPC needs to be a participant in the development and application of the siting criteria. The Montgomery County Department of Parks has already done a great deal of work in this area and it might be a useful precedent to consider.

Buildings Section

Building Actions, p. 100: Bullet 4: It might be inherent but consider adding either the word local or regional to the sentence to read: “Create local (or regional) jobs and grow the workforce by....”

Action B-1 (Electrification Code Requirements for Existing Commercial and Public Buildings), p. 103, first paragraph: The potential strategies identified include (relevant language italicized):

- Implement a point of sale or lease ordinance requiring building owners to replace fossil fuel equipment with electric options before a building is *sold, leases are renewed, or new leases are signed after tenant turnover.*
- Building owners undertaking major renovations or HVAC/water heating replacement must electrify their equipment *before being granted an occupancy or mechanical permit.*

From the language in the first paragraph it appears that if the building owner does not sell the building, or if tenants stay in a building for many, many years, the building would not be required to electrify until that time. Potentially, this may be beyond 2035.

Transportation Section

Action T-2, p. 120: Consider rewriting sentence beginning with “In other portions of the CIP...” as “The county could also prioritize CIP funds to construct bicycle infrastructure and trail projects that connect existing active transportation networks.”

Action T-2, p. 120: In the sentence about road diets, consider deleting “road” and adding the underlined, “...which include the removal and repurposing of ~~road~~ both travel and parking lanes for other modes of transportation.”

Carbon Sequestration Section

Page 136 – Carbon Sequestration Actions: This section should include language that includes the potentially vast carbon sink that soil represents, not only in agriculture, but also as part of the ecosystems mentioned in the third bullet.

Action S-4, Regenerative Agriculture: The Department of Parks manages some land devoted to agriculture. As this restoration transition takes place, methods of agriculture that preserve and add carbon to the soil should be encouraged among contract farmers.

Climate Adaptation Section

Page 160, A-7: Green Streetscape: This item could be titled “Green Public Spaces”. All areas of the public realm must adhere to advanced green standards in order to keep them cool and usable in the future and for stormwater management and water quality. Each new area master plan undertaken should address the appropriate shading and cooling of public spaces to combat Urban Heat Island Effect and should guide this process of creating “Green Public Spaces”.

Climate Governance Section

The Montgomery County Planning Department is generally supportive of the recommended actions under Climate Governance to institutionalize within government organizations a commitment to addressing climate change in its operations, policies, plans, training and procedures. There are several recommended actions (G-1, G-2, G-7, G-12, and G-15) where M-NCPPC is specifically noted as a contributor. Action G-7 (Evaluate and Update County Planning, Policy and Operations Activities to Account for the Risks of Climate Change Impacts and Prioritize the Needs of Vulnerable Residents) is of particular importance for Montgomery Planning’s work in evaluating development applications as well as in recommending land use strategies to reduce greenhouse gas emissions, implement other climate adaptation efforts and advance equity in Thrive Montgomery 2050 and other recent plans.

Regarding Action G-11 (Develop Climate, Energy, Health, and Racial Equity Metrics and a Data-Driven Assessment and Reporting Process), p. 188, while M-NCPPC is not listed as a contributor, Montgomery Planning recently developed its data-driven, map-based [Equity Focus Areas Analysis](#) tool to help identify areas of the county with potential racial and social inequities. Montgomery Planning will use this tool to inform its efforts to develop planning practices to address these inequities. Additionally, Montgomery Planning will be developing an Equity Opportunity Index later in 2021. The Equity Opportunity Index will help determine how to further integrate racial equity and social justice into the master planning process in Montgomery County. The Index will examine factors contributing to an equitable county such as socio-economic conditions, access to transportation, and social determinants for healthy communities. Through the Equity Opportunity Index, Montgomery Planning also will establish methods for benchmarking equity and measuring outcomes in local and countywide plans and policies. These tools and their data are also envisioned as a resource for County agencies to inform their work to address equity.

In light of these efforts, Montgomery Planning recommends that M-NCPPC be added as a contributor for Action G-11. This addition would be similar to M-NCPPC already being listed as a contributor for Action G-15 (Consolidate County Climate Data) in recognition of its important role as a resource of data and data analysis.

As a member of the Climate Leadership Team since its launch in 2019, Montgomery Planning supports Action G-12’s call to formalize this group and enhance its role as a multi-agency collaborative to provide more strategic guidance to address climate change.